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VIA ECF

The Honorable Judge Brenda K. Sannes
United States District Court Judge
Northern District of New York
PO Box 7336
Syracuse, NY 13261-7366

Re: Jane Doe et al. vs. Howard Zucker, et al., Case No.: 1:20-CV-0840 (BKS/CFH)

Dear Judge Sannes:

Plaintiffs are scheduled to file a responsive brief today in response to the third motion to dismiss (Dkt 78-1). This motion, unlike the other two motions to dismiss, seeks to dismiss the as applied challenges for four plaintiff families (Doe, Coe, Goe, and Koe). We respectfully request permission to file one 45-page combined memorandum of law on behalf of all of these plaintiffs responding to the defendants' motion to dismiss.

While each of the plaintiffs is entitled to file a separate responsive memorandum of law, we seek to consolidate the response into one 45-page response. The additional twenty pages are necessary to adequately address the factual background for each of the plaintiffs and respective school district and the additional legal arguments related to some of the plaintiffs.

Thank you for your consideration of this matter.

Respectfully Submitted,

s/Sujata S. Gibson

Sujata Gibson

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CC: All attorneys of record via ECF